

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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RED ROCK SOURCING LLC AND
CORONADO DISTRIBUTING LLC,

Plaintiffs,

Case No. 21-CV-01054-JPC

v.

JGX LLC AND LIBERTY INTERNATIONAL
DISTRIBUTORS, LLC,

Defendants.
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**INITIAL DISCLOSURES PURSUANT TO FEDERAL RULES OF
CIVIL PROCEDURE 26(A)(1) BY DEFENDANT, JGX LLC**

Defendant, JGX LLC (“JGX”) provides these initial disclosures in connection with the within action (the “Action”), pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, to the Plaintiffs, Red Rock Sourcing LLC (“Red Rock”) and Coronado Distributing LLC (“Coronado”) (collectively, the “Plaintiffs”):

**A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION
RELEVANT TO DISPUTED FACTS**

The following sets forth the identity of the individuals likely to have discoverable information that JGX may use to support its claims and defenses to the claims alleged by Plaintiffs in connection with the Action, except for information that JGX would use solely for impeachment. JGX’s disclosures are based on information presently available to them, and they reserve the right to supplement this list as discovery progresses.

1. Jack Grazi, Director of JGX, c/o Lazarus & Lazarus, P.C., 240 Madison Avenue, 8th Floor, New York, New York 10016, (212) 889-7400, has knowledge and information regarding the claims, defenses and transactions involving the parties and the facts alleged in the Action.

2. Nouri Jaradeh, Principal of JGX, c/o Lazarus & Lazarus, P.C., 240 Madison Avenue, 8th Floor, New York, New York 10016, (212) 889-7400, has knowledge and information regarding the claims, defenses and transactions involving the parties and the facts alleged in the Action.
3. David Amoyelle, a principal of Liberty International Distributors, LLC, 35 Cary Street, Lakewood, New Jersey 08701, (718) 417-7676, has knowledge and/or information regarding the claims, defenses and transactions involving the parties and the facts alleged in the Action.
4. One or more current and/or former employees and/or representatives of Liberty International Distributors, LLC, 35 Cary Street, Lakewood, New Jersey 08701, (718) 417-7676, with knowledge and/or information regarding the claims, defenses and transactions involving the parties and the facts alleged in the Action.
5. David Ghermezian, Vice Chairman and Chief Executive Officer of Triple Five Worldwide LLC, 1 Meadowlands Plaza, East Rutherford, New Jersey 07073, (201) 340-2900, has knowledge and/or information regarding the claims, defenses and transactions involving the parties and the facts alleged in the Action.
6. Anthony Carrelli, sales executive at Rigz LLC, 5601 Hwy North, Suite 730, Lake Havasu City, Arizona, (805) 835-3360, has knowledge and/or information regarding the claims, defenses and transactions involving the parties and the facts alleged in the Action.
7. Jarret Portz, Owner of Rigz LLC, 5601 Hwy North, Suite 730, Lake Havasu City, Arizona, (805) 835-3360, has knowledge and/or information regarding the claims, defenses and transactions involving the parties and the facts alleged in the Action.
8. One or more current and/or former employees and/or representatives of Rigz LLC, 5601 Hwy North, Suite 730, Lake Havasu City, Arizona, (805) 835-3360, with knowledge

and/or information regarding the claims, defenses and transactions involving the parties and the facts alleged in the Action.

9. Jeff Daprizio, owner of Red Rock, c/o Nixon Peabody LLP, 55 West 46th Street, New York, New York 10036, (212) 940-3111, has knowledge and/or information regarding the claims, defenses and transactions involving the parties and the facts alleged in the Action.
10. One or more current and/or former employees and/or representatives of Red Rock, c/o Nixon Peabody LLP, 55 West 46th Street, New York, New York 10036, (212) 940-3111, with knowledge and/or information regarding the claims, defenses and transactions involving the parties and the facts alleged in the Action.
11. One or more current and/or former employees and/or representatives of Coronado, c/o Nixon Peabody LLP, 55 West 46th Street, New York, New York 10036, (212) 940-3111, with knowledge and/or information regarding the claims, defenses and transactions involving the parties and the facts alleged in the Action.

JGX will disclose to Plaintiff any additional persons that he may discover to have information relevant to the issues in this lawsuit.

**B. DESCRIPTION BY CATEGORY AND LOCATION OF ALL DOCUMENTS
RELEVANT TO DISPUTED FACTS ALLEGED IN THE PLEADING**

1. Books, records, and/or communications of or relating to the relationship by and between the parties.
2. Books, records, and/or communications of or relating to the subject matter of the Complaint.

3. Books, records and/or communications of or relating to any and all agreements by and between the parties and third-parties of or relating to the subject matter of this Action.

All of the above documents are in the possession of JGX and/or are located at JGX's counsel's office at 240 Madison Avenue, 8th Floor, New York, New York 10016.

JGX is in the process of identifying and collecting the above referenced documents and any other documents that it may use to support their claims and defenses. JGX will produce, at a mutually convenient time and place, responsive, non-responsive, non-objectionable, relevant, non-confidential and non-privileged documents in its possession, custody or control, to the extent such documents exist, that JGX are able to locate after a reasonable and diligent search.

By providing the foregoing description of documents, JGX does not waive its rights to withhold production of any document in its possession which is privileged or protected by the attorney-client privilege, the work product immunity, or any other claim of privilege or immunity, or which JGX is prohibited from producing under a legitimate confidentiality agreement, or where production of such document would be otherwise unlawful. JGX expressly reserve the right to identify and use other documents in support of their defenses if, during the course of this litigation, such other documents become known to JGX.

JGX reserves the right to revise or supplement this list as new information is identified or acquired through discovery or investigation.

C. COMPUTATION OF DAMAGES

Not applicable.

D. INSURANCE AGREEMENTS

Not applicable.

E. EXPERT WITNESS

JGX has not retained an expert witness at this time but reserves the right to do so.

JGX reserves the right to supplement the within disclosures as further discovery and information become available prior to the trial of this action.

Dated: May 11, 2021
New York, New York

Respectfully submitted,

LAZARUS & LAZARUS, P.C.
Attorneys for Defendant, JGX LLC

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